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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

***In re***

**TRIDENT HOLDING COMPANY, LLC, *et al.*,  
Debtors.<sup>1</sup>**

**Chapter 11**

**Case No. 19-10384 (SHL)**

**(Jointly Administered)**

**NOTICE OF AGENDA OF MATTERS SCHEDULED FOR HEARING  
ON JULY 29, 2019 AT 2:00 P.M. (PREVAILING EASTERN TIME)**

Location of Hearing: Honorable Sean H. Lane, Courtroom 701, United States  
Bankruptcy Court, Southern District of New York, One Bowling  
Green, New York, NY 10004

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of their respective tax identification numbers, are as follows: Trident Holding Company, LLC (6396); American Diagnostics Services, Inc. (2771); Community Mobile Diagnostics, LLC (9341); Community Mobile Ultrasound, LLC (3818); Diagnostic Labs Holdings, LLC (8024); FC Pioneer Holding Company, LLC (6683); JLMD Manager, LLC (8470); Kan-Di-Ki LLC (6100); Main Street Clinical Laboratory, Inc. (0907); MDX-MDL Holdings, LLC (2605); MetroStat Clinical Laboratory – Austin, Inc. (4366); MX Holdings, LLC (8869); MX USA, LLC (4885); New Trident Holdcorp, Inc. (4913); Rely Radiology Holdings, LLC (3284); Schryver Medical Sales and Marketing, LLC (9620); Symphony Diagnostic Services No. 1, LLC (8980); Trident Clinical Services Holdings, Inc. (6262); Trident Clinical Services Holdings, LLC (1255); TridentUSA Foot Care Services LLC (3787); TridentUSA Mobile Clinical Services, LLC (0334); TridentUSA Mobile Infusion Services, LLC (5173); U.S. Lab & Radiology, Inc. (4988). The address of the Debtors' corporate headquarters is 930 Ridgebrook Road, 3rd Floor, Sparks, MD 21152.

Copies of Motions and  
Applications:

Copies of each pleading identified below can be viewed and/or obtained by: (i) accessing the Court's website at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov), (ii) contacting the Office of the Clerk of the Court at United States Bankruptcy Court, Southern District of New York, One Bowling Green, New York, NY 10004, or (iii) from the Debtors' notice and claims agent, Epiq Corporate Restructuring, LLC, at <https://dm.epiq11.com/Trident> or by calling 1-800-960-1226. Note that a PACER password is needed to access documents on the Court's website.

## **I. ADJOURNED MATTERS**

1. **Plan of Reorganization:** Modified Second Amended Joint Plan of Reorganization of Trident Holding Company, LLC and Its Debtor Affiliates [Docket No. 630] (Date Filed: 7/3/19)

Objection

Deadline: June 17, 2019 at 4:00 p.m. (Prevailing Eastern Time)

Objections/

Responses Filed:

- a. Texas Health and Human Services Commission's Limited Objection to Confirmation of Debtors' Second Amended Joint Chapter 11 Plan of Reorganization [Docket No. 548] (Date Filed: 6/14/19)
- b. Limited Objection of Metrostat to Plan of Schryver Medical Sales and Marketing, LLC [Docket No. 549] (Date Filed: 6/14/19)
- c. Objection of Invesco Credit Partners Fund, L.P. and Invesco Credit Partners Fund-A, L.P. to Confirmation of the Second Amended Joint Plan of Reorganization of Trident Holding Company, LLC and Its Debtor Affiliates [Docket No. 553] (Date Filed: 6/17/19)
- d. Objection of United States Trustee to the Second Amended Joint Plan of Reorganization of Trident Holding Company, LLC, and Its Debtor Affiliates [Docket No. 557] (Date Filed: 6/17/19)
- e. Objection of the Official Committee of Unsecured Creditors to Confirmation of the Second Amended Joint Plan of Reorganization of Trident Holding Company, LLC and Its Debtor Affiliates [Docket No. 558] (Date Filed: 6/17/19)
- f. Eisenhower Medical Center's Limited Objection to the Second Amended Joint Plan of Reorganization of Trident Holding Company, LLC and Its Debtor Affiliates [Docket No. 559] (Date Filed: 6/17/19)

- g. Limited Objection of Element Fleet Corporation to Confirmation of the Second Amended Joint Plan of Reorganization of Trident Holding Company, LLC and Its Debtor Affiliates [Docket No. 560] (Date Filed: 6/17/19)
- h. Limited Objection of Terri Vineyard, Individually and on Behalf of the Estate of Carol Nolan, Deceased to Second Amended Joint Plan of Reorganization of Trident Holding Company, LLC and Its Debtor Affiliates [Docket No. 561] (Date Filed: 6/17/19)
- i. Relator Ravi Srivastava's Objection and Joinder to the Objection of the Official Committee of Unsecured Creditors to the Second Amended Joint Plan of Reorganization of Trident Holding Company, LLC and Its Debtor Affiliates [Docket No. 566] (Date Filed: 6/17/19)
- j. Objection of the United States of America to the Second Amended Joint Plan of Reorganization of Trident Holding Company, LLC and Its Debtor Affiliates [Docket No. 586] (Date Filed: 6/17/19)
  - i. Declaration of William Waldron in Support of Objection of the United States of America to the Second Amended Joint Plan of Reorganization of Trident Holding Company, LLC and Its Debtor Affiliates [Docket No. 587] (Date Filed: 6/17/19)
- k. Alamo's Limited Objection to Confirmation of Second Amended Joint Plan of Reorganization of Trident Holding Company, LLC and Its Debtor Affiliates [Docket No. 644] (Date Filed: 7/3/19)
- l. Texas Health and Human Services Commission's Joinder in Part to the Objection of the United States of America to the Second Amended Joint Plan of Reorganization of Trident Holding Company, LLC and Its Debtor Affiliates [Docket No. 700] (Date Filed: 7/22/19)

Related  
Documents:

- m. Second Amended Joint Plan of Reorganization of Trident Holding Company, LLC and Its Debtor Affiliates [Docket No. 386] (Date Filed: 5/8/19)

Status: This matter has been adjourned until August 21, 2019 at 11:00 a.m.

- 2. **Rule 3018(a) Motion:** Rule 3018(a) Motion to Temporarily Allow Metrostat Sellers' Claim For Voting on Chapter 11 Plan of Schryver Medical Sales and Marketing, LLC [Docket No. 454] (Date Filed: 5/24/19)

Objection

Deadline: July 8, 2019 at 4:00 p.m. (Prevailing Eastern Time)

Objections

/Responses Filed: None.

Status: This matter has been adjourned until August 21, 2019 at 11:00 a.m.

3. **Committee Challenge Budget Motion**: Motion of the Official Committee of Unsecured Creditors to Increase Challenge Budget as Set Forth in the Final DIP Financing Order [Docket No. 483] (Date Filed: 6/3/19)

Related

Documents:

- a. Notice of Adjournment of Hearing of Motion of the Official Committee of Unsecured Creditors to Increase Challenge Budget as set Forth in the Final DIP Financing Order [Docket No. 577] (Date Filed: 6/19/19)

Objection

Deadline: June 20, 2019 at 4:00 p.m. (Prevailing Eastern Time), extended until July 8, 2019 at 4:00 p.m. (Prevailing Eastern Time)

Objections/

Responses Filed: None.

Status: This matter has been adjourned until August 21, 2019 at 11:00 a.m.

4. **Capital Finance Opportunities 1701C, LLC against Trident Holding Company, LLC et al., Adv. Case No. 19-01145**: Adversary Complaint [Adv. Docket No. 1] (Date Filed: 5/22/19)

Related

Documents:

- a. Debtor Defendants and D&O Defendants Parrish and Smith's Motion to Dismiss Plaintiff's Adversary Complaint Under Fed. R. Bankr. P. 7012 and Fed. R. Civ. P. 12(b)(6) [Adv. Docket No. 11] (Date Filed: 6/10/19)
- i. Memorandum of Law of Debtor Defendants and D&O Defendants Parrish and Smith in Support of Their Motion to Dismiss Plaintiff's Adversary Complaint [Adv. Docket No. 12] (Date Filed: 6/10/19)
- b. Defendants Silver Point Finance, LLC and SPCP Group, LLC's Motion to Dismiss the Capital Finance Opportunities Adversary Complaint [Adv. Docket No. 16] (Date Filed: 6/10/19)

- i. Memorandum of Law of Defendants Silver Point Finance, LLC and SPCP Group, LLC in Support of Their Motion to Dismiss the Capital Finance Opportunities Adversary Complaint [Adv. Docket No. 17] (Date Filed: 6/10/19)
- ii. Declaration of Robert A. Britton in Support of Defendants Silver Point Finance, LLC and SPCP Group, LLC's Motion to Dismiss the Capital Finance Opportunities Adversary Complaint [Adv. Docket No. 10] (Date Filed: 6/10/19)
- c. Manager Defendants' Motion to Dismiss Adversary Complaint [Adv. Docket No. 18] (Date Filed: 6/11/19)
  - i. Declaration of Matthew L. McGinnis in Support of Manager Defendants' Motion to Dismiss Adversary Complaint [Adv. Docket No. 13] (Date Filed: 6/10/19)
- d. Plaintiff's Omnibus Memorandum of Law in Opposition to the Motions to Dismiss Plaintiff's Adversary Complaint of: (I) Silver Point Defendants, (II) Debtor Defendants and D&O Defendants Parrish and Smith, and (III) Manager Defendants [Adv. Docket No. 25] (Date Filed: 6/21/19)
- e. Debtors' Reply to Plaintiff's Omnibus Memorandum of Law in Opposition to the Motions to Dismiss Plaintiff's Adversary Complaint of: (I) Silver Point Defendants, (II) Debtor Defendants and D&O Defendants Parrish and Smith, and (III) Manager Defendants [Adv. Docket No. 28] (Date Filed: 6/25/19)
- f. Manager Defendants' Reply in Support of Motion to Dismiss Adversary Complaint [Adv. Docket No. 27] (Date Filed: 6/25/19)
- g. Reply of D&O Defendants Parrish and Smith in Support of the Motions to Dismiss Plaintiff's Adversary Complaint [Adv. Docket No. 29] (Date Filed: 6/25/19)
- h. Defendants Silver Point Finance, LLC and SPCP Group, LLC's Reply Memorandum in Further Support of Their Motion to Dismiss the Capital Finance Opportunities Adversary Complaint [Adv. Docket No. 30] (Date Filed: 6/25/19)

Status: This matter is adjourned.

5. **Silver Point Finance, LLC et al. against Capital Finance Opportunities 1701C, LLC, Adv. Case No. 19-01161**: Adversary Complaint [Adv. Docket No. 1] (Date Filed: 5/29/19)

Status: This matter is adjourned.

## II. MATTERS GOING FORWARD

6. **United States of America et al. ex rel. Ravi Srivastava v. Trident Holding Company, LLC et al., Adv. Case No. 19-01143**: Adversary Complaint to Determine Nondischargeability of Debt Under Section 1141(d)(6) of the Bankruptcy Code [Adv. Docket No. 1] (Date Filed: 5/20/19)

Related  
Documents:

- a. Debtors' Motion to Dismiss Mr. Srivastava's Adversary Complaint to Determine Nondischargeability of Debt Under Section 1141(d)(6) of The Bankruptcy Code [Adv. Docket No. 12] (Date Filed: 6/20/19)

Status: This matter is going forward as a scheduling conference.

7. **United States of America ex rel. Peter Goldman against Symphony Diagnostic Services No. 1, LLC, d/b/a MobilexUSA, Adv. Case No. 19-01142**: Amended Adversary Complaint to Determine Dischargeability of Debt Pursuant to U.S.C. § 1141(d)(6) [Adv. Docket No. 2] (Date Filed: 5/21/19)

Related  
Documents:

- a. Debtors' Motion to Dismiss Mr. Goldman's Amended Adversary Complaint to Determine Dischargeability of Debt Pursuant to U.S.C. § 1141(d)(6) [Adv. Docket No. 5] (Date Filed: 6/20/19)

Status: This matter is going forward as a scheduling conference.

8. **Estimation Motion**: Debtors' Motion Pursuant to 11 U.S.C. §§ 105(a) and 502(c) to Establish Claims Estimation Procedures for *Qui Tam* Claims [Docket No. 705] (Date Filed: 7/24/19)

Related  
Documents:

- a. Memorandum Endorsed Order [Docket No. 709] (Date Filed: 7/25/19)
- b. Notice of Status Conference Regarding Debtors' Motion Pursuant to 11 U.S.C. §§ 105(a) and 502(c) to Establish Claims Estimation Procedures for *Qui Tam* Claims [Docket No. 710] (Date Filed: 7/25/19)

Objections/  
Responses Filed: None at the time of filing this agenda.

Status: This matter is going forward.

9. **First Omnibus Objection:** Debtors' First Omnibus Objection to Claims (Incorrectly Classified Claims) [Docket No. 418] (Date Filed: 5/14/19)

Related  
Documents:

- a. Notice of Adjournment of Hearing on Debtors' First Omnibus Objection to Claims (Incorrectly Classified Claims) [Docket No. 492] (Date Filed: 6/5/19)
- b. Notice of Adjournment of Hearing on Debtors' Objection to Claims Filed by Beckman Coulter, Inc. [Docket No. 625] (Date Filed: 7/2/19)

Objection

Deadline: June 6, 2019 at 4:00 p.m. (Prevailing Eastern Time), extended until June 20, 2019 at 4:00 p.m. (Prevailing Eastern Time)

Objections/  
Responses Filed: None.

Status: This matter is going forward.

10. **Settlement Motion:** Debtors' Motion for an Order Pursuant to Bankruptcy Code Sections 363(b) and 365 and Bankruptcy Rules 6004 and 9019 Authorizing the Debtors to Enter Into and Approving Stipulation with Laboratory Corporation of America Holdings [Docket No. 509] (Date Filed: 6/10/19)

Related  
Documents:

- a. Notice of Filing of Order Pursuant to Bankruptcy Code Sections 363(B) and 365 and Bankruptcy Rules 6004 and 9019 Authorizing the Debtors to Enter Into and Approving Stipulation with Laboratory Corporation of America Holdings [Docket No. 541] (Date Filed: 6/13/19)

Objection

Deadline: July 8, 2019 at 4:00 p.m. (Prevailing Eastern Time)

Objections/  
Responses Filed: None.

Status: This matter is going forward.

11. **Motion to Compel:** Beckman Coulter, Inc.'s Motion for Entry of an Order Compelling Assumption or Rejection of Leases Pursuant to 11 U.S.C. § 365 or in the Alternative, Granting Adequate Protection or Relief from the Automatic Stay [Docket No. 528] (Date Filed: 6/11/19)

Objection

Deadline: July 8, 2019 at 4:00 p.m. (Prevailing Eastern Time)

Objections/

Responses Filed:

- a. Debtors' Statement in Response to Beckman Coulter, Inc.'s Motion for Entry of an Order Compelling Assumption or Rejection of Leases Pursuant to 11 U.S.C. § 365 or in the Alternative, Granting Adequate Protection or Relief from the Automatic Stay [Docket No. 654] (Date Filed: 7/8/19)

Status: This matter is going forward.

Dated: July 25, 2019

New York, New York

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